

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

<p>ARY JEWELERS, LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>IBJTC BUSINESS CREDIT CORPORATION and DAVID MOLINARIO,</p> <p style="text-align: center;">Defendants.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Civil Action No. 04-10281-EFH</p>
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DEFENDANT'S PROPOSED EXHIBIT LIST

Defendant IBJTC Business Credit Corporation hereby submits its exhibit list.

Exhibit	Description
A	Opinion issued by the Supreme Court of Kansas in the case entitled <u>ARY Jewelers, LLC v. Scott Krigel</u> , 82 P.3d 460 (Kan. 2003) (the "Krigel Litigation")
B	Amended Petition for Declaratory Judgment filed by ARY Jewelers, LLC ("ARY") in the District Court of Johnson County, Kansas in the Krigel Litigation
C	Brief of Appellee ARY filed in the Court of Appeals of the State of Kansas in the Krigel Litigation
D	ARY's Suggestions In Opposition to Plaintiffs' Emergency Motion For A Temporary Restraining Order in the case entitled <u>M. Fabrikant & Sons, Inc. v. ARY Jewelers, LLC</u> , Case No. 01-0671-CV-W-5 (W.D. Mo.) (the "Fabrikant Litigation")
E	ARY's Supplemental Suggestions In Opposition To Preliminary Injunction, filed in the Fabrikant Litigation
F	Sworn declaration of Haji Abdul Razzak Yacoob, filed by ARY in the Fabrikant Litigation
G	March 21, 2001 document authored by Gohar Husain of ARY and sent by fax to Abdul Razzak of ARY

Exhibit	Description
H	March 28, 2001 Letter from Abdul Razzak to Scott W. Krigel
I	April 5, 2001 Letter from Abdul Razzak to Scott W. Krigel
J	January 9, 1998 Article published on the website of <u>The New York Times</u> entitled "Bhutto Clan Leaves Trail of Corruption in Pakistan."
K	Brochure produced by ARY in this action
L	Plaintiff's Responses to Defendant's Requests for Admissions, served by fax on March 15, 2005
M	Order entered by the United States Bankruptcy Court for the Western District of Missouri, dated May 1, 2001, authorizing the sale of Krigel's, Inc. to Hannoush Jewelers, Inc.
N	Affidavit of Max Jevinsky dated August 6, 2001
O	Stock Purchase Agreement between Krigel's, Inc. ("Krigel's") and ARY dated November 21, 2000
P	Executed copy of January 24, 2001 Term Sheet – Krigel's, Inc.
Q	Dow Jones Newswire Articles
R	February 28, 2001 Letter from Brian Kennedy of IBJ to Gohar Husain of ARY
S	December 15, 2000 Letter from Thomas Morgan to Gohar Husain
T	March 20, 2001 Letter from Thomas Morgan to Gohar Husain
U	March 27, 2001 Letter from Thomas Morgan to Gohar Husain
V	March 19, 2001 Letter from Thomas J. Berger to Tom Morgan and accompanying enclosures
W	Fax cover sheet dated "March 12, 2001" from Randall L. Klein to Tom Morgan and Steve Cole attaching April 5, 2001 fax from Sandy Krigel to Randall L. Klein and Mark T. Benedict

Dated: November 20, 2006

ROPES & GRAY LLP

By: /s/ F. Turner Buford
Robert S. Fischler (Admitted *Pro Hac Vice*)
Christopher R. Dillon (BBO No. 640896)
F. Turner Buford (BBO No. 661311)
One International Place
Boston, MA 02110-2624
(617) 951-7000 (telephone)
(617) 951-7050 (telefax)
Turner.buford@ropesgray.com

*Attorneys for Defendant IBJTC
Business Credit Corp.*

CERTIFICATE OF SERVICE

I, F. Turner Buford, hereby certify that, pursuant to Fed. R. Civ. P. 5.4(c), a true copy of this document was electronically served upon counsel of record for the plaintiff in this action on November 20, 2006.

By: /s/ F. Turner Buford